

EXHIBIT F

DECLARATION OF ELIZABETH C. HELM

I, Elizabeth C. ("Kate") Helm, declare under penalty of perjury that the following is true and correct:

1. I am over the age of 21 and am a resident of the state of Georgia. I have personal knowledge of the facts and circumstances set forth in this Declaration and, if called upon to do so, I could and would competently testify thereto.

2. I am a lawyer licensed to practice in the State of Georgia. I am a partner at Nelson Mullins Riley & Scarborough, LLP, and I am one of the lawyers representing C.R. Bard, Inc. and Bard Peripheral Vascular (collectively "Bard") in the Bard IVC Filters Products Liability Litigation.

3. I am the lawyer for Bard who has participated in the meet and confer process with plaintiffs' counsel regarding plaintiffs' challenges to the Bard privilege logs.

4. During the numerous meet-and-confer sessions preceding the plaintiffs' Motion to Compel, I specifically discussed each document subject to the plaintiffs' challenge. I answered the plaintiffs' questions about each document, particularly about who participated in each protected communication. Counsel for the plaintiffs often took notes and asked follow-up questions. For some documents, I read portions to counsel for the plaintiffs, subject to the Court's Rule 502(d) Order. In January, 2016 I traveled to Phoenix, Arizona and showed certain documents to counsel for plaintiffs, subject to the Court's Rule 502(d) Order. Again, counsel for plaintiffs took notes and asked follow-up questions.

Dated: April 18, 2016


Elizabeth C. Helm